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CLIFFORD J. PROUD
U.S. MAGISTRATE JUDGE
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

Defendants.

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CASE NO. 04-M-60029-CJP

All in violation of Title 18, United States Code, Section 1958.

COUNT 2

On or about April 15, 2004, in Monroe County, within the Southern District of Illinois, and elsewhere,

KATIE KOESTER WOLFMEYER,

defendant herein, did use a facility in interstate commerce — namely, a telephone — with the intent that a murder be committed in violation of the laws of the State of Missouri — namely, Mo. Stat. 565.020 — as consideration for a promise and agreement to pay anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958.

COUNT 3

On or about April 15, 2004, in Monroe County, within the Southern District of Illinois, and within the Eastern District of Missouri,

**MICHAEL DANTON, and
KATIE KOESTER WOLFMEYER,**

defendants herein, did knowingly conspire to cause another to travel in interstate commerce, from the State of Illinois to the State of Missouri, with intent that a murder be committed in violation of the laws of the State of Missouri — namely, Mo. Stat. 565.020 — as consideration for a promise and agreement to pay anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958.

I further state that I am a Special Agent with the Federal Bureau of Investigation(FBI) and that this complaint is based on information provided to me by Special Agent Martin R. Feely, and the following facts:

1. On April 14, 2004, a Cooperating Witness (CW) for the FBI was with a woman named KATIE WOLFMEYER, defendant herein, and several of WOLFMEYER's friends. The CW was told that WOLFMEYER was having a personal relationship with a St. Louis Blues professional hockey player named MICHAEL DANTON. DANTON contacted WOLFMEYER telephonically and falsely told her that somebody was coming from Canada to kill him. DANTON told WOLFMEYER that he wanted to kill the person who was coming to kill him. DANTON asked WOLFMEYER if she knew anybody who would be willing to kill this individual from Canada for \$10,000.

2. While WOLFMEYER was on the cellular telephone with DANTON, WOLFMEYER told DANTON that she may know somebody willing to kill the Canadian person for him. WOLFMEYER asked the CW if he would be willing to kill the individual from Canada for DANTON. The CW did not originally believe that WOLFMEYER was serious. WOLFMEYER then gave her cellular telephone to the CW, and the CW and DANTON had a short conversation. During the first conversation with DANTON, DANTON asked the CW to kill the individual from Canada for \$10,000. DANTON told the CW that the individual from Canada was a "hitman" who was coming to kill DANTON over a money debt. The CW wanted to get more details so the CW provided DANTON with the CW's cellular telephone number.

3. At approximately 12:02AM on April 15, 2004, DANTON, who was in San Jose, California, called the CW in Monroe County, Illinois. The telephone call was recorded and has been reviewed by Special Agents of the FBI. During the conversation, DANTON instructed the CW as to how DANTON thought the CW should murder the "hitman."

4. DANTON told the CW that WOLFMAYER could show the CW where DANTON's apartment is located. DANTON told the CW that the CW should murder the hitman in such a manner as to make it appear the hitman was killed while attempting to burglarize DANTON's residence. DANTON said law enforcement could be led to believe that two burglars came to DANTON's residence and therein argued regarding some aspect of the burglary. DANTON told the CW it would appear that, during the struggle, one of the burglars was killed, while one fled the scene with \$3,000 in cash and other valuable items.

5. DANTON told the CW that the CW could keep the \$3,000 as a down payment for the CW's services. DANTON stated there were three envelopes in a safe in DANTON's closet, and that each envelope contained \$1,000. DANTON told the CW that DANTON would meet with the CW five or six days after the murder to give the CW more money.

6. At one point during the conversation, DANTON told the CW that "when the thing goes down, you know, obviously, I don't want to know anything about it." During another portion of the conversation, the CW asked DANTON, "what you're asking me to do is go to your place now, or tomorrow, and take care of this before you get home, correct?" DANTON responded, "Yeah."

7. When the CW suggested the CW murder the hitman at a more private location, DANTON told the CW that DANTON thought the murder should occur in DANTON's residence. DANTON told the CW, "and that way he's there. I'll know it's taken care of because when I come back, obviously I'll see him there."

8. During this conversation, DANTON repeatedly asked the CW if there was any way the CW could commit the murder that same night. DANTON told the CW, "The only way that I'm going to be able to sleep tonight is knowing that the guy trying to kill me is done himself."

DANTON further stated, "I'm pretty much begging," and "I wouldn't resort to this if it wasn't a matter of life and death."

9. The CW finally realized that DANTON was committed to having this individual from Canada killed. The CW immediately contacted the FBI. The CW advised that he was supposed to contact WOLFMEYER on the night of April 15, 2004, and WOLFMEYER was to drive the CW to DANTON's apartment in Missouri. WOLFMEYER was supposed to get the CW past the apartment's security guard and show the CW the exact apartment.

10. At approximately 8:30PM on April 15, 2004, WOLFMEYER, in Missouri, called the CW on the telephone in Illinois. The telephone call was recorded and has been reviewed by Special Agents of the FBI. During the conversation, WOLFMEYER told the CW that DANTON told WOLFMEYER that DANTON wanted the CW to murder the hitman. WOLFMEYER also told the CW that DANTON told WOLFMEYER that DANTON intended to pay the CW \$10,000 for murdering the hitman. The CW and WOLFMEYER agreed to meet at a Denny's Restaurant on Lindbergh Avenue in North Saint Louis County at approximately 10:00PM that night.

11. At approximately 10:51PM on 04/15/2004, the CW spoke with WOLFMEYER on the telephone. The telephone call was recorded and has been reviewed by Special Agents of the FBI. During the conversation, the CW told WOLFMEYER the reason the CW was late in meeting with WOLFMEYER was that the CW had to stop to get a gun. The CW and WOLFMEYER agreed to meet a few minutes later at Denny's.

12. At approximately 10:30PM, on April 15, 2004, the CW met with WOLFMEYER in the North County area. WOLFMEYER entered the CW's vehicle and they traveled to 1800 S. Brentwood Boulevard, Brentwood, Missouri. WOLFMEYER showed the CW where to drive up

to the guard gate. The security guard asked who the CW wanted to see, and the CW told him MIKE DANTON. The security guard called to DANTON's apartment and an acquaintance of DANTON came to the 2nd floor railing. The acquaintance yelled down and asked the CW who he was. The CW became alarmed and gave the man a false name. The acquaintance told the CW he was DANTON's father. The CW drove out of the parking lot. Subsequently WOLFMEYER was arrested.

13. The acquaintance called DANTON and the Brentwood Police to attempt to figure out why the CW had come to DANTON's apartment.

14. At approximately 12:19AM on April 16, 2004, the CW spoke with DANTON on the telephone. The telephone call was recorded and has been reviewed by Special Agents of the FBI. During the conversation, DANTON told the CW, if questioned by the police regarding the CW's attempt to gain access to DANTON's apartment, to tell the police the CW didn't know DANTON and that the CW was simply accompanying WOLFMEYER to DANTON's apartment because she was uncomfortable going by herself. DANTON told the CW that "this is the only way we can both get out of this."

15. The CW questioned DANTON regarding the identity of the person in DANTON's apartment. The CW asked DANTON, "So you don't even know the guy I was supposed to kill in your place?" DANTON replied, "No, I don't." The CW asked DANTON, "Are you still going to pay me," and DANTON replied, "Yes." The CW told DANTON, "I'm sorry it botched," and DANTON replied, "We'll fix this, and we'll do it soon."

16. The acquaintance was interviewed and stated that he and DANTON had a severe argument on Tuesday, April 13, 2004, concerning DANTON's promiscuity and use of alcohol.

DANTON is a hockey player for the St. Louis Blues. DANTON begged the acquaintance not to go to the General Manager of the St. Louis Blues hockey organization and ruin his career. The acquaintance threatened to leave DANTON.

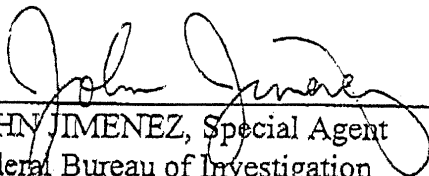
17. The acquaintance, to whom DANTON had given custody of DANTON's residence, signed a written consent form to search DANTON's apartment, including a safe therein. FBI Agents located three thousand dollars in cash in an unlocked safe in DANTON's bedroom closet.

18. On April 16, 2004, WOLFMEYER was interviewed and provided a written confession. WOLFMEYER admitted that DANTON had told her the story about a "hitman" coming to kill him. WOLFMEYER was concerned for DANTON's safety and agreed to find somebody to kill the "hitman." WOLFMEYER admitted that she was to take the CW to DANTON's apartment and show him which apartment was DANTON'S.

19. Between approximately 12:26AM and 12:33AM on April 16, 2004, DANTON left three voicemail messages on WOLFMEYER's cellular telephone. The messages were recorded and have been reviewed by Special Agents of the FBI. In the first message, DANTON told WOLFMEYER, if questioned by the police regarding the CW's attempt to gain access to DANTON's apartment, to tell the police the CW didn't know DANTON and that the CW was simply accompanying WOLFMEYER to DANTON's apartment because she was uncomfortable going by herself. DANTON further told WOLFMEYER to erase DANTON's message after she had listened to it. In the second and third messages, DANTON told WOLFMEYER to act as if DANTON and WOLFMEYER had not spoken for one month. At the conclusion of the third message, DANTON again told WOLFMEYER to erase DANTON's messages after she had listened to them.

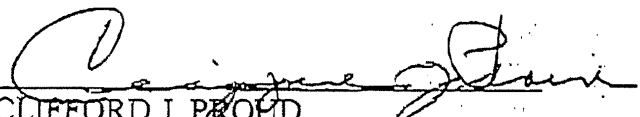
20. On April 16, 2004, the acquaintance agreed to consensually record a telephone call with DANTON. The acquaintance called DANTON and asked DANTON why he wanted to have him killed. DANTON broke down and sobbed. DANTON explained that he felt backed into a corner and also felt that the acquaintance was going to leave him. DANTON did not want to allow the acquaintance to leave him, therefore decided to have him murdered.

FURTHER AFFLIANT SAYETH NAUGHT.

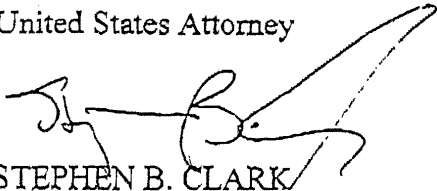

JOHN JIMENEZ, Special Agent
Federal Bureau of Investigation

State of Illinois)
)
County of St. Clair) SS.

Sworn to before me and subscribed in my presence on the 16th day of April 2004, at East St. Louis, Illinois.


CLIFFORD J. PROED
United States Magistrate Judge

RONALD J. TENPAS
United States Attorney


STEPHEN B. CLARK
Assistant United States Attorney